



SOUTHERN NEVADA WATER AUTHORITY

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June 28, 2010

Commission's Secretary, Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Dear Secretary Dortch:

SUBJECT: OFFICE OF ENGINEERING AND TECHNOLOGY REQUESTS INFORMATION ON USE OF 1675-1710 MHz BAND, ET DOCKET NO. 10-123

This document is in response to the FCC's request for information on the use of the 1675-1710 MHz Band. This spectrum is currently used by the United States Geological Survey (USGS) for transmission of real time stream gage and groundwater level data, NOAA national weather satellite service data and other weather information data that is crucial for water agencies throughout the United States (U.S.), including the Southern Nevada Water Authority (SNWA).

The SNWA is a cooperative agency consisting of seven member agencies, formed in 1991 to address Southern Nevada's unique water needs on a regional basis. SNWA officials are charged with managing the region's water resources and providing for Las Vegas area residents' and businesses' present and future water needs.

The NOAA Geostationary Operational Environmental Satellites Data Collection System (GOES DCS) enables a large variety of environmental data to be relayed from remote locations across the planet, through the GOES system, where the data is then disseminated to the system users.

SNWA uses the GOES system extensively as part of its mandate to provide Southern Nevada with a reliable water supply. Of particular note is the use of the USGS stream gage and groundwater level data collected throughout Nevada and the western U.S., which assists in overall management of water resources throughout the region. This data is transmitted using the 1675-1710 MHz Band, and allows for analysis of the hydrologic data to best manage and protect water resources. The data is especially useful during high run-off of snowmelt, and has proven to be very useful to track any climate change on stream flows throughout the western U.S. The data also is used for water accounting for major reservoirs and streams in the Colorado River Basin, which is crucial in water management planning for SNWA and other water utilities.

SNWA continues to develop water resources plans as a prolonged drought impacts the region. Plans are ongoing for developing of groundwater resources in parts of eastern Nevada. In 2006, SNWA was granted water rights from hydrographic areas in Nevada. These water rights came

SNWA MEMBER AGENCIES

Big Bend Water District • Boulder City • Clark County Water Reclamation District • City of Henderson • City of Las Vegas • City of North Las Vegas • Las Vegas Valley Water District

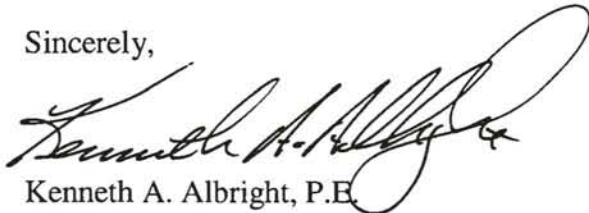
with various stipulations agreed upon by the parties involved, including a number of federal, state, and local agencies. One of the stipulations agreed to is the provision for real-time water-level data. It is SNWA's and USGS plan to utilize the 1675-1710 MHz Band to provide continuous data to the stipulated parties.

The proposal to allow the use of the 1675-1710 MHz Band for other uses would hinder current GOES DCS users ability to download data directly and rely on a 3rd- Party vendor for the data. This would impact the real-time functionality and reliability of the USGS stream gage and groundwater level data for SNWA. Furthermore, the loss of the services, if the Band no longer transmits the USGS data, would have negative impacts on water management issues. SNWA and others would be required to find a new Band to transmit its real-time water level data as required by water rights agreements at a considerable cost.

In summary, SNWA recommends that the 1675-1710 MHz frequencies remain available for use by the federal government's critical data transmission services. SNWA and other local agencies rely on the federal government to maintain its GOES system for the data and information needed to manage water resources critical for their customers.

Should you have any questions or concerns, please contact me at 702 862-3776.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Albright", with a stylized flourish at the end.

Kenneth A. Albright, P.E.
Director, Groundwater Resources

KAA:CH:vw

c: Richard B. Holmes, Deputy General Manager, Engineering/Operations
Bill E. Rinne, Director, Surface Water Resources
Zane L. Marshall, Director, Environmental Resources
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